

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

---

IN RE: John H. Sanderson, III	:	Case No. 21-12084-elf
	:	
Debtor	:	Chapter 13
	:	

---

**MOVANT/LANDLORD'S MOTION FOR RELIEF  
FROM THE AUTOMATIC STAY**

ROBERTS MILL APARTMENT ASSOCIATES, LLC hereby moves for Relief from the Automatic Stay in this matter, and in support of this motion states as follows:

1. The debtor is the sole leaseholder for the rental property located at 121 Matlack Drive, Maple Shade, NJ 08052, which is part of the Roberts Mill Apartments. (A copy of the lease and subsequent extension is attached as Exhibit A.)

2. The debtor filed a Chapter 13 Bankruptcy petition in this court on July 27, 2021.

3. Before the debtor filed his petition, an eviction action was filed with the Superior Court of New Jersey under docket number BUR-LT-002760-20 seeking to retake possession of the rental property due to nonpayment of rent.

4. The eviction case was stayed upon filing of the bankruptcy petition, and a judgment for possession has not been entered against the debtor.

5. The debtor's monthly rent is \$1,639.00, plus late fees (\$163.90 per month), utilities (\$130.00 per month), a pet fee (\$45.00 per month), and renter's insurance (\$15.75 per month).

6. The debtor has made no payments toward the post-petition rent.

7. The debtor owes post-petition rental arrears of \$5,980.95, broken down as follows: three months' rent in the amount of \$4,917.00, plus \$491.70 in late fees, \$390.00 in

utility charges, \$135.00 in pet fees, and \$47.25 in insurance fees, all of which are due and owing under the lease. Movant has also incurred legal fees and costs in filing this motion and respectfully seeks an award of such fees in accordance with the lease, Bankruptcy Code, and applicable law.

8. The debtor's failure to pay post-petition rent is cause for relief from the automatic stay.

WHEREFORE, Movant requests that this Court lift the Automatic Stay and allow Movant to seek judgment for possession of the rental premises at 121 Matlack Drive, Maple Shade, NJ.

Respectfully submitted,

Date: October 5, 2021

/s/ William R. McLaughlin

William R. McLaughlin, Esq.  
McLaughlin Law Office, P.C.  
6701 Germantown Ave., Ste. 210-7  
Philadelphia, PA 19119  
(215) 242-9000  
Attorney for Movant/Applicant